

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

POPLAR BLUFF INDUSTRIES, INC.)	
)	
Plaintiff)	Case No.: 1:18-cv-00213
)	
vs.)	
)	
HARTFORD FIRE INS. CO. and)	
HARTFORD CASUALTY INS. CO.)	
)	
Defendants)	

MEMORANDUM REGARDING DISCOVERY

COME NOW Defendants, HARTFORD FIRE INSURANCE COMPANY and HARTFORD CASUALTY INSURANCE COMPANY (hereinafter “Hartford”), by and through counsel, and its Memorandum regarding disputes concerning discovery issues states as follows:

1. Defendants are happy to report that the parties have made great strides in resolving our discovery disputes. We are not asking you to rule on any discovery disputes, objections, etc. at this time.
2. Plaintiff provided responses to Defendants’ initial written discovery. Defendants are substantially satisfied with these responses. There is some information and documents which Defendants believe they are entitled to that have not already been provided, but Defendants will follow up with Plaintiff to discuss these relatively narrow issues and are optimistic that we will be able to resolve these issues.
3. With respect to the discovery served on Defendants, counsel for both parties took the opportunity to meet and confer in an effort to address many of Defendants’ concerns with the initial discovery.

4. Plaintiff's counsel was kind enough to provide Defendants with a second set of interrogatories and requests for production with the areas of inquiry greatly narrowed following the parties' negotiations.

5. Defendants are currently finalizing responses/answers to the amended written discovery and hope to have the discovery responses finalized as soon as possible.

6. We anticipate producing nearly all of the claim file, subject to withholding of items privileged from discovery by the attorney/client and work-product privileges.

7. Any documents that we do not supply will be identified in a list of privileged items.

8. The discoverable portions of the claim file have been Bates-stamped and should be distributed shortly.

9. We believe these supplemental answers, responses, and objections will provide Plaintiff with much of the information it demands.

10. If Plaintiff feels more information or documents are needed, we will do our best to work out any such disputes.

11. In summary, our disputes with Plaintiff's discovery is much narrower than they were sixty (60) days ago.

12. We are optimistic that we will be able to resolve most, if not all, of the remaining disputes.

13. If any disputes remain, we will submit those very narrow issues to you for ruling.

Respectfully submitted,

/s/ Scott C. Harper

Scott C. Harper, #31378

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was filed with the Court's electronic filing system, with notice of case activity to be generated and sent electronically by the Clerk of said Court on the 5th day of March, 2019, to all counsel of record.

/s/ Scott C. Harper